

Hon. Kenneth M. Karas

United States District Judge

Southern District of New York

Hon. Charles L. Brieant Jr. Federal Building and U.S. Courthouse

300 Quarropas Street

White Plains, NY 10601

Re: United States v. Jahnine Wolinsky

Case No.: 7:25-cr-00071-KMK

Request for Temporary Removal of Ankle Monitor – April 22, 2025

Dear Judge Karas:

I respectfully submit this letter on behalf of my client, **Jahnine Wolinsky**, to request a temporary modification of her bail conditions to allow for the **removal and same-day reinstallation of her ankle monitor on April 22, 2025**, in order to undergo a medically necessary MRI with IV contrast.

While the initial emergency room discharge summary from **Saint Joseph's Medical Center** listed only "pain in breast," updated medical records dated **April 10, 2025**, now confirm the diagnosis of "**rupture of breast implant, right side.**" This diagnosis is consistent with Ms. Wolinsky's symptoms and was confirmed by the treating physician.

Following her discharge, Ms. Wolinsky consulted with her plastic surgeon, **Dr. Enrique Hanabergh Jr.**, who performed her original implant procedure. Based on his assessment, an **MRI with IV contrast** is required to fully evaluate the extent of the rupture and determine the appropriate surgical intervention. A referral has been provided and is enclosed. Dr. Hanabergh has confirmed that an ultrasound would not be sufficient, given the materials involved and the complexity of the rupture.

Because the ankle monitor **cannot be worn during the MRI scan**, we respectfully request that it be **temporarily removed and reinstalled the same day** under the supervision of **Pretrial Services**, solely for the purpose of completing the scan. Pretrial Services **has no objection** to this accommodation and has confirmed their ability to coordinate same-day removal and reinstallation. Additionally, the **Government does not object** to this request for medical purposes.

We appreciate the Court's consideration of this time-sensitive medical matter. Please let me know if any additional documentation or clarification is required.

Respectfully submitted,

Samantha Chorny
Samantha Chorny, Esq.

Attorney for Defendant

SMC Law Firm

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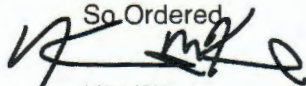
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Granted.

So Ordered


4/21/25